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6 *Attorneys for Defendant*
7 MHM SOLUTIONS, LLC

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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 NAVDEEP DHALIWAL, an individual,
12
13 Plaintiff,

14 v.

15 MHM SOLUTIONS, LLC, a Foreign Limited
Liability Company; STATE OF NEVADA
16 BUREAU OF DISABILITY ADJUDICATION,
a Department of the State of Nevada,
17 Defendants.

Case No. 2:21-cv-00568-GMN-BNW

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO FILE
RESPONSIVE PLEADING**
(SECOND REQUEST)

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19 Plaintiff NAVDEEP DHALIWAL (“Plaintiff”) and Defendant MHM SOLUTIONS, LLC
20 (“Defendant”) by and through their counsel, hereby stipulate and agree to extend the time for
21 Defendant MHM Solutions, LLC to file a response to the Complaint by two (2) weeks from June 29,
22 2021, up to and including **July 13, 2021**. This is the second request for an extension of time to respond
23 to the Complaint. The parties make this request as Defendant is continuing to gather information and
24 requires additional time to prepare a response.

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1 The instant request is made in good faith and not for the purpose of delay.

2 Dated: June 24, 2021

Dated: June 24, 2021

3 Respectfully submitted,

Respectfully submitted,

4
5 /s/ Trevor J. Hatfield

6 TREVOR J. HATFIELD, ESQ.
HATFIELD & ASSOCIATES, LTD.

7 *Attorney for Plaintiff*
8 NAVDEEP DHALIWAL

/s/ Amy L. Thompson

WENDY M. KRINCEK, ESQ.
AMY L. THOMPSON, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Defendant
MHM SOLUTIONS, LLC

9
10 **ORDER**

11 **IT IS SO ORDERED.**

12 Dated: June 28
13 _____, 2021.

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15 _____
16 UNITED STATES MAGISTRATE JUDGE

17 4842-1549-6944.1 / 108840-1045
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